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Please reply to Southern California

VIA ELECTRONIC MAIL AND FIRST CLASS MAIL

January 4, 2008

Ms. Linda Ketellapper, SFD-7-5
U.S. Environmental Protection Agency, Region IX
Superfund Division
75 Hawthorne Street
San Francisco, CA 94105

**Re: CERCLA Section 104(e) Request for Information
Omega Superfund Site, Whittier, CA**

Dear Ms. Ketellapper:

We are in receipt of your November 1, 2007 letters¹, wherein you request² information from our clients Robert O. Berg and Donna M. Berg, Pearl Rosenthal, and the Estate of Arnold Rosenthal (the EPA referred to the Estate of Arnold Rosenthal as "The Rosenthal Family Trust"³) (collectively "Bergs and Rosenthals") regarding the Omega Superfund Site in Whittier, California.

This letter confirms our telephone conversation yesterday wherein you agreed to participate in a teleconference with our office and Steve Berninger in order to address our clients' concerns with providing all the requested information. Specifically, our clients' have concerns with providing the

¹The EPA addressed three separate letters to: (1) Robert O. Berg and Donna M. Berg, (2) Pearl Rosenthal, and (3) Pearl Rosenthal, Trustee The Rosenthal Family Trust Dated June 3, 1989. We respond in one letter on behalf of all respondents, Robert Berg, Donna Berg, Pearl Rosenthal, and the Estate of Arnold Rosenthal (referred to by the EPA as "The Rosenthal Family Trust").

²The EPA's request required a written response within 30 days of receipt of this letter (e.g. on December 5, 2007). However, you graciously granted our clients request for a 30-day extension to respond.

³In the letter you name Pearl Rosenthal as Trustee, however Pearl Rosenthal is not the trustee of the Estate of Arnold Rosenthal.

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requested tax returns and "Statement's of Net Worth" without the appropriate safeguards in place in order to prevent such private information from being disclosed to the public and other parties in the Omega litigation. As I mentioned yesterday, our clients' were recently served with a complaint in the Omega litigation, Angeles Chemical Company, Inc. et al., v. Omega Chemical PRP Group LLC, et al., Case No. EDCV07-1471 VAP (JCRx), wherein our clients' are one in 136 defendants named in the regional environmental contamination litigation.

The Bergs and Rosenthals are committed to providing all the requested information once these concerns are addressed and understand that all the appropriate protections will be in place upon the production of the requested information. We look forward to speaking with Mr. Berninger and yourself to address all of our clients' concerns. Thank you for your attention to this matter and we look forward to hearing from you to schedule the teleconference.

Should you have any additional questions, please do not hesitate to contact us.

Very truly yours,

THE LAW OFFICES OF
TIMOTHY C. CRONIN, ESQ.

A handwritten signature in black ink, appearing to read "Chris C. Chapman", written in a cursive style.

CHRIS C. CHAPMAN

KBC/

cc: clients